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Rodney L. Joyce
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July 31, 2001

VIA HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

RECEIVED

JUL 31 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

EX PARTE
REDACTED - FOR PUBLIC INSPECTION

Re: Application by Verizon Pennsylvania, Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region, Inter-LATA Services in the State of Pennsylvania, CC Docket No. 01-138.

Dear Ms. Salas:

On July 30, 2001, Don Sussman, Vice President of Regulatory Affairs for Network Access Solutions ("NAS") and Glenn Gaillard, Director of NAS Service Activations met with Rob Tanner, Brent Olson, Ben Childers, Gail Cohen, Priya Shrinivasan, Trey Hanbury, and Brad Koerner of the Common Carrier Bureau's Policy Division to discuss Verizon's performance in Pennsylvania and the implication of Verizon's 271 application presently before the Commission. Specifically, NAS discussed the lack of cooperative testing on Verizon's part when installing circuits, NAS' concern regarding Verizon's deficient billing practices and billing medium, and the impact of false information provided to CLECs using the Verizon GUI Pre-qual tool.

Attached is a redacted version of the written materials provided by NAS to the Commission staff during the meeting. The redacted version has removed proprietary commercial information specific to NAS' service activation.

Handwritten: 071

Ms. Magalie Roman Salas
July 31, 2001
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In accordance with Section 1.1206 of the Commission's rules, and original and a copy of this letter, and the associated attachment, are being submitted. Please contact the undersigned if there are any questions in connection with this matter.

Sincerely,

A handwritten signature in black ink that reads "Rodney L. Joyce /cc." The signature is written in a cursive, flowing style.

Rodney L. Joyce
Counsel to Network Access Solutions

cc: Rob Tanner
Brent Olson
Ben Childers
Gail Cohen
Priya Shrinivasan
Trey Hanbury
Brad Koerner
Susan Pié
Ann Berkowitz (Verizon)



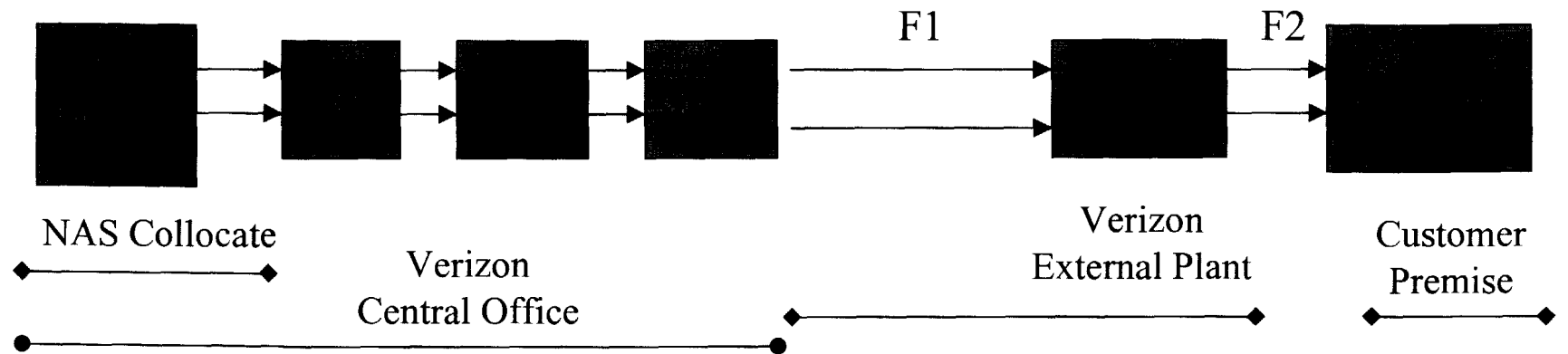
Network Access Solutions Cooperative Testing

7/30/01

What is Expected?

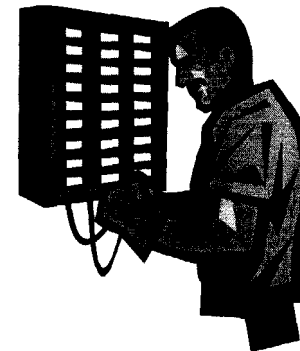
- The FCC ordered Verizon ILECs, among other things, to instruct the company's DSL loop installers to:
 - Conduct cooperative testing on all DSL loops at the NID; and,
 - Remove half ringers on all DSL loops at the time they are installed

Expected Procedure



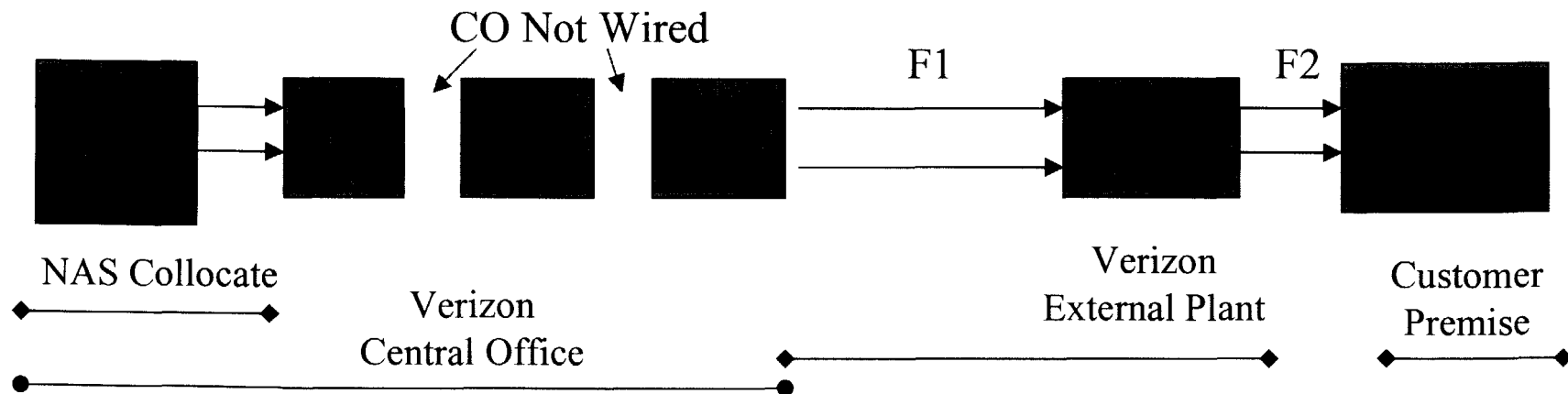
NAS Tech

Verizon Tech calls NAS to perform a cooperative test from the NID.



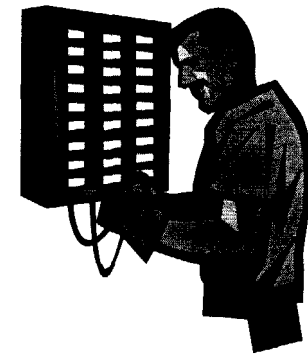
Verizon Tech

What we see....



NAS Tech

- Verizon Tech calls NAS for cooperative test
 - NAS detects that CO is not wired and rejects test.
- 3) Verizon tech completes NID wiring.
 - 4) Verizon routes install to CO to complete.
 - 5) Verizon calls NAS from CO to test (not from NID).
 - 6) NAS runs one way test (not cooperative) on circuit.



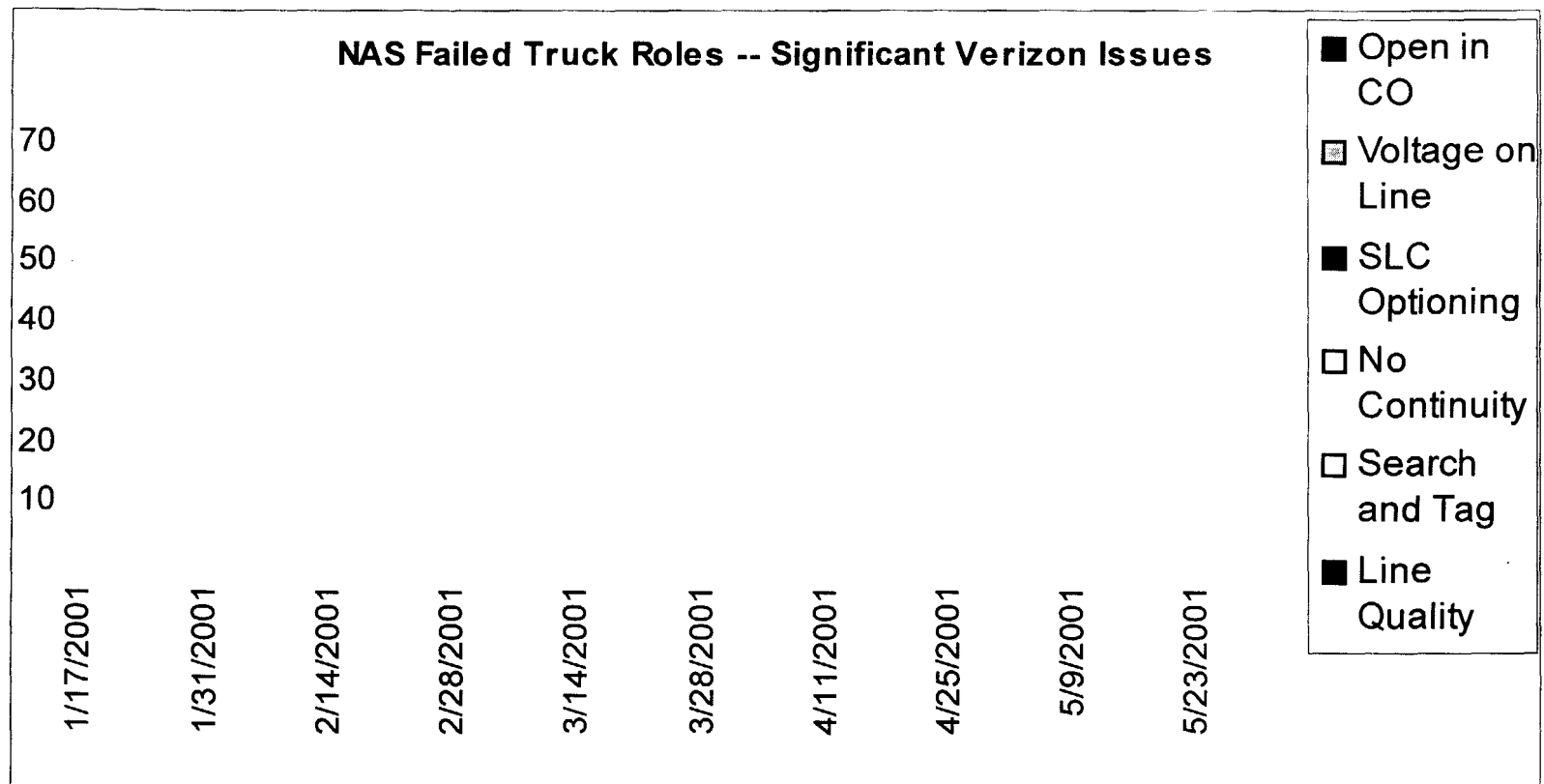
Verizon Tech

***Ramifications: NAS installs fail due to no continuity at NID**

Recommendations

- Verizon wires loop prior to install.
- If CO wire is not complete at install, Verizon needs to redispach to the NID to complete test.

Verizon Issue Summary



Open in the CO Summary Nov 2000-May 2001

Month	State	Orders	% of tickets to state	% of tickets to total orders
Nov-00	DC DE MA MD NJ NY PA VA			
11/1/00 Total				

Month	State	Orders	% of tickets to state	% of tickets to total orders	Month	State	Orders	% of tickets to state	% of tickets to total orders	Month	State	Orders	% of tickets to state	% of tickets to total orders
Dec-00	CT DC MA MD NJ NY PA VA				Jan-01	DC DE MA MD NJ NY PA VA				Feb-01	DC DE MA MD NJ NY PA VA			
12/1/00 Total					1/1/01 Total					2/1/01 Total				
Month	State	Orders	% of tickets to state	% of tickets to total orders	Month	State	Orders	% of tickets to state	% of tickets to total orders	Month	State	Orders	% of tickets to state	% of tickets to total orders
Mar-01	DC MA MD NJ NY PA VA				Apr-01	DC MA MD NH NJ NY PA VA				May-01	DC MA MD NJ NY PA VA			
3/1/01 Total					4/1/01 Total					5/1/01 Total				

NAS Confidential

No Facilities/PreQual Tool Results

According to the data pulled from April 1-June 30:

- -- of -- (or --%) of loop rejects in PA were due to “no facilities.”

- Verizon rejected --% (--) due to loop length through “prequal tool”.

- Recent reprovisioning/migration of other carriers’ existing customers (i.e., --) show significant recurring inaccuracies in GUI pre-qual tool results.

- Verizon rejected --% (-) due to incompatible technologies